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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 **Brian Whitaker**, an individual,

20 Plaintiff,

21 vs.

22 **Akuranvyka USA Inc.**,
23 a California Corporation

24 Defendant.
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Case No. 4:21-cv-09994-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE FOR JOINT SITE
INSPECTION**

The Honorable; Jon S. Tigar

Filed: **December 27, 2021**
Current Site Inspection: **Jun 17, 2022**
New Site Inspection: **July 1, 2022**
Trial Date: None Set

**JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINE TO CONDUCT JOINT SITE INSPECTION**

Plaintiff Brian Whitaker and Defendant Akuranvyka USA Inc. (“Defendant”) jointly stipulate to extend the deadline to conduct a Joint Site Inspection (“JSI”) pursuant to General Order 56. The current deadline to conduct the JSI is June 17, 2022. By way of this Stipulation, the Parties seek to extend the JSI deadline to July 1, 2022; however, to the extent the Court has not ruled on Defendant’s pending Motion to Dismiss by July 1, 2022, the Parties agree to extend the JSI deadline to a date that is 14-days after the Court’s Order is issued. The Parties believe that good cause exists based on the following:

WHEREAS, the instant case was filed by Plaintiff on December 27, 2021.

WHEREAS, on April 18, 2022, Defendant filed a Motion to Dismiss Plaintiff’s Complaint for Lack of Standing and a Request for an Evidentiary Hearing (the “Motion”) [*see* Dkt. No. 18.];

WHEREAS, a hearing date of June 9, 2022 has been assigned to Defendant’s Motion;

WHEREAS, the Defendant has requested that the joint site inspection be continued to July 1, 2022;

WHEREAS, Plaintiff and Defendant jointly stipulate to extending the deadline to conduct the JSI deadline from June 17, 2022 to July 1, 2022.

WHEREAS, the Defendant has advised it is reserving its right to request another extension should the Court not issue a ruling by July 1.

NOW THEREFORE, it is hereby stipulated by and between Plaintiff and Defendant, that the deadline to conduct a JSI will be continued to July 1, 2022.

IT IS SO STIPULATED.

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1 Dated: May 16, 2022

2 Respectfully submitted,

3 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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6 By /s/ Hayley S. Grunvald
7 HAYLEY S. GRUNVALD

8 MOJI SANIEFAR

9 Attorneys for Defendant,
10 AKURANVYKA USA INC.

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12 Dated: May 16, 2022

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15 By /s/ Aaina Duggal
16 AAINA DUGGAL

17 Attorneys for Plaintiff,
18 BRIAN WHITAKER

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: May 16, 2022

By: /s/ Hayley S. Grunvald
Attorney for Defendant,
AKURANVYKA USA INC.